

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

UNITED STATES OF AMERICA

:

INDICTMENT

- v. -

:

MIGUEL PEREZ,

12 Cr. 901

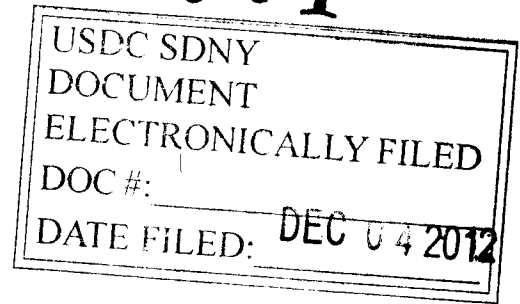
Defendant.

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COUNT ONE



The Grand Jury charges:

1. From at least in or about May 2012, up to and including on or about November 3, 2012, in the Southern District of New York and elsewhere, MIGUEL PEREZ, the defendant, and others known and unknown, intentionally and knowingly, did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that MIGUEL PEREZ, the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance involved in the offense was 100 grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Section 846.)

JUDGE SWAIN

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MIGUEL PEREZ, the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the narcotics violation alleged in Count One of this Indictment, including but not limited to:


a. a sum of money representing the amount of proceeds obtained as a result of the controlled substance offense for which the defendant is liable.

5. If any of the forfeitable property described above in Paragraph 4, as a result of any act or omission of MIGUEL PEREZ, the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- or
- e. has been commingled with other property which

cannot be subdivided without difficulty,
it is the intent of the United States, pursuant to 21 U.S.C.
§ 853(p), to seek forfeiture of any other property of said
defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)



FOREPERSON
12-4-12



PREET BHARARA
United States Attorney

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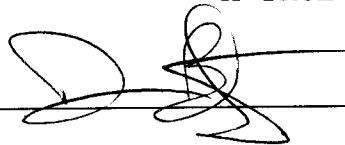
12 Cr.

(21 U.S.C. § 846)

PREET BHARARA

United States Attorney.

A TRUE BILL

 12-4-12
Foreperson.

12/4/12 - Filed Indictment
cc Case assigned to Judge Sullivan.
Judge Mearns
USMD